RM-11392 does present some valid points with regard to PactorIII's possibility of interference during remote, automatic operation. This concern could be addressed by continuing to allow the higher-bandwidth transmissions (2.4 kHz) in a sub-sub band, rather than completely eliminating its use below 28 MHz. Perhaps a channelized system may be workable for systems such as WinLink 2000.

With the current state of propagation, the MUF rarely allows operation above 28 MHz, which would effectively end the use of PactorIII.

The Amateur Radio Emergency Service (ARES) has made a considerable investment in time and equipment to pursue a high speed, reliable data transmission mode, the need for which has been demonstrated in recent disaster scenarios. Key to this operation is the ability to use whatever band possible to achieve a usable path.

Improvements in technology and operating procedures will provide answers to these problems, not regulations which restrict utilization and development. No mode of propagation with bandwidth which is approximately that of voice should be restricted, just on that basis.

Please do not adopt the proposal of RM-11392.

Thank You, Mark Van Sickle, KM4RK